

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA
CHARLESTON DIVISION**

ELVIS MOODIE, RAYON FISHER,
DESMOND ELLIS, and
KEISHA COLLINS-ENNIS, on behalf of
themselves and all others similarly situated,

Plaintiffs,

v.

KIAWAH ISLAND INN COMPANY, LLC,
d/b/a KIAWAH ISLAND GOLF RESORT,

Defendant.

Case No. 2:15-cv-01097-RMG

DECLARATION OF NANCY BLOODGOOD

1. I am a partner of Bloodgood & Sanders, LLC and one of Plaintiffs' attorneys in this matter.

2. I am admitted to practice in the state court of Pennsylvania and the District of Columbia Court of Appeals (currently on inactive status in both) and the state of South Carolina, the federal courts of the District of South Carolina, the United States Court of Appeals for the Fourth Circuit, and the Supreme Court. I earned my Juris Doctor Degree from the Columbus School of Law at Catholic University in 1983 where I was Associate Editor of Law Review. I was admitted to practice in the state of Pennsylvania the same year. I was admitted to practice in the District of Columbia Court of Appeals in 1985, and the state of South Carolina in 1986.

3. I previously worked as a partner at Young Clement Rivers, LLP in Charleston and was also a Deputy County Attorney for Charleston County and staff attorney for the South Carolina Coastal Council. I have previously served as President of the South Carolina Association of County Attorneys and President of the South Carolina Chapter of the Federal Bar Association (FBA), as well as the Chair of the Employment and Labor Law Section of the FBA. I am a certified mediator and arbitrator and currently a member of the Charleston County

Bar Association, the South Carolina Bar Association, the Federal Bar Association, the National Employment Lawyers Association, and the James L. Petigru Inn of Court. I have been recognized as one of the top Employment and Labor Law attorneys in South Carolina in the past nine (9) years of Super Lawyers publications.

4. During the course of this litigation, I have kept contemporaneous time records related to my work on this case. Those time records are recorded in timekeeping software during the normal course and scope of my work. My time records related to this case are attached to this Declaration as Exhibit A.

5. The time records from our time-keeping system of the paralegal, who helped me with this case, Amanda Kramer, and whom I was responsible for supervising, are also attached as part of Exhibit A to this Declaration.

6. Pursuant to 28 U.S.C. § 1746 and under penalty of perjury, I declare that the foregoing facts are true and correct to the best of my knowledge.

Executed on December 5, 2016.


Nancy Bloodgood

Exhibit A

Kiawah Island Inn Company
Not known as of 3/6/15 alk

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Our File No. 12203-0000P
Statement No: 1

Local Co-Counsel
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	Code		Hours
03/02/2015	NB	Emails with Jim Knoepp re litigation and local counsel	0.20
03/05/2015	NB	Receive and review emails; Research SC Code Section 15-3-560 and reply to Jim re statute, review of draft complaint, particular issues re SCPWA, proposed changes; Multiple emails re same	1.20
03/06/2015	PAR	Multiple telephone conference with Jim Knoepp re filings; Receive and review multiple emails from and to Jim Knoepp re filings; Review pleadings re accuracy; Prepare draft 26.01 Interrogatory Responses; Electronically file Summons, Complaint, 26.01s, and Motions for Pro Hac Vice	1.40
	NB	Receive and review draft complaint and make revisions; Emails with Jim re same; Telephone conference with Jim and Michelle; Prepare documents for filing	0.80
03/09/2015	PAR	Receive and review ECF notices for Complaint, 26.01s, Summons, and Motions; Telephone conference with Charleston ECF office re filings of motions; Telephone conference with Judge Gergel's case manager re filings of motions, proposed orders; Email to Jim Knoepp re filings; Email to Judge Gergel's case manager re proposed orders	0.90
03/11/2015	PAR	(3x) Receive and review emails from and to Jim Knoepp re additional pro hac vice filing	0.10
	NB	Receive and review pro hac vice motion for Sarah Rich	0.10
03/12/2015	PAR	(3x) Prepare email to and receive email from Jim Knoepp re service of complaint; additional pro hac vice filing; Telephone conference with Jim Knoepp re additional filing; (2x) Receive and review ECF notices re order on pro hac vice for Knoepp and Lapointe	0.20
03/13/2015	PAR	Electronically file pro hac vice motion for Sarah Rich; Prepare email to Judge	

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			Hours
		re proposed order; Receive and review ECF notice re filing	0.20
03/31/2015	NB	Receive and review press release and emails re service from Jim and reply with proposed changes to press release	0.20
04/01/2015	NB	Emails with Jim re press	0.20
04/17/2015	NB	Conference with paralegal re service	0.10
04/21/2015	NB	Email to Jim re answer; Receive and review filed documents by opposing counsel	0.20
	NB	Receive and review draft of collective action documents from Jim	0.30
04/22/2015	NB	Review answer and motion to amend; Emails with Jim re same and class certification	0.60
04/24/2015	NB	Receive and review email re pro hac vice and reply to opposing counsel	0.10
04/27/2015	PAR	Receive and review multiple emails from Jim Knoepp and NB re multiple filings; Review filings; Electronically file two separate motions, memorandums and exhibits; Receive and review emails re ECF filings	0.60
	NB	Receive and review emails and attached documents and take steps to have class certification documents filed	0.30
04/28/2015	NB	Receive and review Order	0.10
04/29/2015	NB	Receive and review email from Jim re press and reply	0.30
05/01/2015	PAR	(3x) Receive and review email from and reply to Jim Knoepp re notice of joinder filing; Consult with Lucy Sanders re filing; Electronically file notice; Receive and review email re ECF filing	0.40
	LCS	Review FLSA consent for filing	0.10
05/05/2015	NB	Receive and review emails re 26f conference and filing consents	0.20
	NB	Telephone conference with Michelle and Jim re 26f conference; Attend 26f conference	1.20

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			Hours
05/07/2015	NB	Receive and review motion to dismiss response from Jim	0.20
05/08/2015	NB	Review response and email Jim re same; Receive and review email re discovery language from Michelle	0.90
	PAR	Receive and review ECF notice re response to motion to dismiss	0.20
05/11/2015	NB	Receive and review emails from opposing counsel re scheduling order	0.20
05/12/2015	NB	Receive and review email re discovery issues from opposing counsel	0.10
05/15/2015	NB	Receive and review FLSA opt in forms from Jim and opposing counsel's filed pleadings	0.40
05/18/2015	PAR	Receive and review ECF notices re motion to stay and memorandum, Reply to response to motion to dismiss, Response to motion for class certification,	
	NB	Receive and review email from opposing counsel	0.10
05/20/2015	NB	Receive and review email from Jim re additional filing; Review and analysis response to motion to certify class and Defendant's motion to stay	0.50
05/21/2015	NB	Receive and review FLSA consent to sue and emails re pleadings	0.30
05/22/2015	PAR	Receive and review email from Jim re additional filing re notice of joinder; Electronically file the same; Receive and review ECF notice re same	0.30
	PAR	(4x) Receive and review email from Michelle re filings and respond; Review scheduling order re filings; Electronically file reply to response to motion; Receive and review ECF notice re same	0.50
	NB	Receive and review reply and 26f and comment and take steps to have same filed	0.30
05/26/2015	PAR	(2x) Receive and review email from Michelle re 26f report, additional opt-ins; Receive and review email from Carmen and reply re opt-ins; Forward email to Nancy to review additional opt-in filings; Telephone conference with Carmen re additional filings; Electronically file additional notice of joinder and receive and review ECF notice re same	0.60
05/27/2015	PAR	Receive and review email from Michelle re multiple filings; Receive and	

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			Hours
		review email from Nancy re multiple filings; Review filings and rules re accuracy; Discuss filings with Nancy re questions about joint 26f report and discovery plan; Telephone conference with Molly Cherry's office re confirmation of individual 26.03s; Electronically file joint 26f report, proposed consent amended scheduling order, mediation form, discovery plan, and 26.03s; Receive and review ECF notice re same; Prepare email to Judge re proposed consent amended scheduling order	0.90
	NB	Receive and review filed pleadings	0.20
06/19/2015	PAR	Receive and review emails from co-counsel re additional filing and review same; Electronically file the same; Receive and review ECF notice re same	0.30
06/23/2015	PAR	Receive and review emails from co-counsel re additional filing and review same; Electronically file the same; Receive and review ECF notice re same	0.30
06/25/2015	PAR	Receive and review emails from co-counsel re additional filing and review same; Electronically file the same; Receive and review ECF notice re same	0.30
07/01/2015	NB	Receive and review discovery from Michelle and reply	0.40
07/08/2015	PAR	Receive and review email from Michelle LaPointe re additional filing; Review same; Electronically file additional notice of joinder; Receive and review ECF notice re filing	0.20
07/14/2015	PAR	Receive and review email from Michelle LaPointe re additional filing; scheduling order; Telephone conference with Michelle re same	0.20
07/15/2015	PAR	Review of filed motions; Telephone conference with Judge Gergel's chambers re amended scheduling order; Prepare email to co-counsel re update; Prepare email to Judge Gergel's chambers re proposed amended scheduling order; Electronically file additional notice of joinder; Receive and review ECF notice re same	0.40
07/21/2015	PAR	Review and review email from Sarah Rich re additional filing; Review and electronically file the same; Review and review ECF notice re notice of joinder filing	0.30

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			Hours
07/28/2015	PAR	Review and review email from Jim Knoepp re additional filing; Review and electronically file the same; Review and review ECF notice re notice of joinder filing	0.30
07/30/2015	NB	Receive and review emails re confidentiality order and postings from opposing counsel	0.20
07/31/2015	NB	Receive and review emails from Jim; Review proposed confidentiality order and reply with proposed changes	0.50
08/04/2015	NB	Receive and review Order re dismissal; Email co-counsel	0.40
08/10/2015	NB	Receive and review correspondence from co-counsel re transportation deduction and reply	0.30
08/11/2015	NB	Receive and review multiple emails re Confidentiality Order; Review and analysis Defendant's discovery responses and document production emails	0.60
08/14/2015	PAR	Receive and review email from Sarah Rich re additional filing; Electronically file notice of joinder; Receive and review ECF notice re same	0.30
	NB	Receive and review confidentiality order	0.20
	PAR	Receive and review ECF notice re confidentiality order	0.10
	PAR	Receive and review email from Sarah Rich re consent amended scheduling order; Telephone conference with Judge's chambers re filing question; Electronically file same; Receive and review ECF notice re same; Prepare email to Judge re consent amended scheduling order; Receive and review email from Sarah Rich re additional notice of joinder; Electronically file same; Receive and review ECF notice re same	0.70
08/17/2015	PAR	Receive and review email from Sarah Rich re additional filing; Electronically file same; Receive and review ECF notice re Notice of Completion of Mailing of FLSA Collective Action Notices	0.20
08/18/2015	NB	Receive and review emails from Jim re damages under SCPWA and reply re same	0.40
08/19/2015	NB	Receive and review correspondence from opposing counsel re return travel to	

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			Hours
		Jamaica	0.10
08/21/2015	PAR	Receive and review email from and reply to Jim Knoepp re additional filing; Electronically file additional notice; Receive and review ECF notice re same;	0.20
08/24/2015	NB	Receive and review draft discovery and reply to Michelle	0.30
08/25/2015	PAR	Receive and review ECF notices re Order, Amended Scheduling Order, and Mediation Order; Receive and review email from Jim Knoepp re additional filing; Electronically file additional notice of joinder; Receive and review ECF notice re same	0.30
	NB	Telephone conference with press; Receive and review Order re certification; Email with Jim re call from press	0.40
08/26/2015	PAR	Receive and review email from Sarah Rich re additional filing; Electronically file additional notice of joinder; Receive and review ECF notice re same	0.20
	NB	Receive and review discovery requests from opposing counsel; Emails to and from Sarah re tax returns and appropriate response in discovery	0.30
08/28/2015	PAR	Receive and review email from Jim Knoepp re additional notice of joinder filing; Review same; Electrically file same; Receive and review ECF notice re same	0.20
	NB	Receive and review supplemental responses from opposing counsel	0.10
09/08/2015	PAR	Receive and review email from Sarah re additional FLSA consent filing; Electronically file same; Receive and review ECF notice re same; (3x) Receive and review email from and reply to Sarah re motion for approval of proposed class action; Telephone conference with Judge Gergel's chambers re proposed order; Electronically file same; Receive and review ECF notice re same	0.40
	NB	Receive and review email with class notice and reply	0.20
09/11/2015	PAR	Receive and review email from co-counsel re additional filing; Electronically file same; Receive and review ECF notice re same	0.20
09/15/2015	NB	Receive and review email from co-counsel's office and reply; Electronically file additional notice of joinder; Receive and review ECF notice re same	0.20

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			Hours
09/17/2015	PAR	Receive and review email from co-counsel re additional filing; Electronically file additional notice of joinder; Receive and review ECF notice re same	0.20
09/21/2015	PAR	Receive and review email from co-counsel re additional filing; Electronically file notice of joinder; Receive and review ECF notice re same; Receive and review ECF notice re Defendant's Response in Opposition to Proposed Class Notice	0.40
09/23/2015	PAR	Receive and review email from co-counsel re notice of joinder; Electronically file same; Receive and review ECF notice re same	0.20
09/24/2015	PAR	Receive and review emails from co-counsel re filing; Review filing; Electronically motion to amend and exhibits; Receive and review ECF notice re same; Telephone conference with Sarah Rich re no need for order	0.20
09/28/2015	NB	Receive and review supplement discovery responses	0.20
10/01/2015	PAR	Receive and review email from co-counsel's office re additional filing; Electronically file notice of joinder; Receive and review ECF notice re same	0.20
10/02/2015	PAR	Receive and review email from co-counsel's office re additional filing; Electronically file notice of joinder; Receive and review ECF notice re same	0.20
10/05/2015	PAR	Receive and review email from Michelle re notice of joinder; Electronically file same; Receive and review ECF notice re same	0.20
10/06/2015	PAR	Receive and review email from Michelle re notice of joinder; Electronically file same	0.20
10/09/2015	PAR	Receive and review email from co-counsel re additional notice of joinder; Electronically file same; Receive and review ECF notice re same	0.20
10/12/2015	NB	Receive and review correspondence from opposing counsel re discovery issues	0.20
	PAR	Receive and review email from co-counsel re additional notice of joinder; Electronically file same; Receive and review ECF notice re same	0.20

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			Hours
10/15/2015	LCS	File opt-ins (ECF)	0.20
10/19/2015	PAR	Receive and review ECF notice re defendant's response to motion to amend complaint; Receive and review ECF notices re 32nd and 33rd notice of joinder; Receive and review email from co-counsel re filing for opt-ins; Electronically file same	0.30
10/20/2015	PAR	Receive and review email from co-counsel re additional opt-ins; Electronically file same; Receive and review ECF notice re same	0.20
10/21/2015	PAR	Receive and review email from co-counsel re additional opt-ins; Electronically file same; Receive and review ECF notice re same	0.20
10/23/2015	PAR	Receive and review emails from and to co-counsel re opt-ins; Electronically file the same; Receive and review ECF notice re same	0.20
10/27/2015	PAR	Receive and review emails from and to co-counsel re opt-ins; Electronically file the same; Receive and review ECF notice re same	0.20
	NB	Receive and review emails re depositions and letters re same; Receive and review discovery responses from Kiawah	0.30
10/28/2015	PAR	Receive and review emails from and to co-counsel re opt-ins; Electronically file the same; Receive and review ECF notice re same	0.20
11/03/2015	PAR	Receive and review email from co-counsel re opt-ins; Electronically file same; Receive and review ECF re same; Receive and review ECF re order on motion to amend complaint	0.20
	LCS	Forward notices in word to court	0.20
11/05/2015	LCS	Send corrected notice; Edit draft from alk; File amended complaint	0.40
11/12/2015	PAR	Receive and review email from Sarah re opt-ins; Electronically file same; Receive and review ECF notice re same	0.20
11/16/2015	LCS	Correspond with opposing counsel re amended answer and file two joinders	0.40

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			Hours
11/19/2015	PAR	Receive and review email from Sarah re notice of completion filing; Electronically file the same; Receive and review ECF notice re same	0.20
12/14/2015	NB	Attend deposition at Nexsen Pruet	3.30
12/18/2015	NB	Receive and review discovery responses from opposing counsel	0.10
12/22/2015	NB	Receive and review multiple emails re discovery issues	0.20
01/07/2016	NB	Receive and review emails and correspondence re discovery and mediation and reply re fees	0.30
01/13/2016	NB	Attend mediation	9.60
01/15/2016	PAR	Receive and review multiple ECF notices re opt out clients	0.20
	NB	Receive and review email re settlement demand from Jim	0.10
01/19/2016	NB	Receive and review emails re discovery and depositions; Telephone conference with Cherie re settlement; Text and telephone conference with Jim re same	0.60
01/20/2016	NB	Email to Cherie; Receive and review emails from Jim re settlement	0.30
01/21/2016	PAR	Receive and review order on mediation; Telephone conference with Judge Gergel's chambers re filings; Email with Sarah re same; Receive and review ECF notice re opt out	0.30
	NB	Receive and review mediation report and emails re same	0.30
01/22/2016	PAR	(2x) Receive and review email and reply to Sarah re filing; Electronically file notice of mediation; Receive and review ECF re same	0.20
	NB	Receive and review emails from Jim re 30b6 deposition topics and reply	0.30
01/24/2016	NB	Telephone conference with Jim re telephone conference with Tom Wills; Multiple emails with Jim re motion to amend and SCPWA; Telephone conference with Tom Wills re settlement	0.80
01/25/2016	PAR	Receive and review emails from and reply to Sarah re filing motion to amend	

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			Hours
		complaint and scheduling order and proposed order to Judge; Electronically file motion; Receive and review ECF re same; Receive and review ECF from Judge re Defendant's time to respond to motion	0.30
	LCS	Research SCPWA and tips as wages; Review motion to amend before filing	0.50
	NB	Receive and review second amended complaint and emails from Jim and reply	0.50
01/26/2016	PAR	Receive and review fifteen ECF notices re opt out clients	0.20
	NB	Receive and review opt out forms	0.20
01/27/2016	PAR	Receive and review two ECF notices re opt out clients	0.10
01/28/2016	NB	Receive and review multiple emails re discovery issues and supplemental discovery requests	0.30
01/30/2016	NB	Receive and review emails from Jim re telephone conference with opposing counsel	0.20
01/31/2016	NB	Receive and review email from Sarah re Perry Woodside with attachments	0.20
02/01/2016	PAR	Receive and review multiple emails re filing for extension of time for SJ motion; Electronically file same; Receive and review ECF notice re same; Prepare email to Judge re proposed order	0.20
	PAR	Receive and review ECF notices re opt out client	0.10
	NB	Receive and review emails from Jim re extension of time	0.10
02/02/2016	PAR	Receive and review ECF notices re Defendant's Response to Plaintiffs' Motion and Order re same	0.20
	NB	Receive and review emails re 30b6; Receive and review Order re amended complaint	0.50
	PAR	Receive and review four ECF notices re opt out clients	0.10
02/03/2016	PAR	Receive and review emails re second amended complaint; Electronically file same; Receive and review ECF re same	0.20
	NB	Receive and review emails from Jim re additional witness and reply	0.20
02/04/2016	NB	Receive and review email from Jim; REsearch rules and reply; Receive and	

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			Hours
		review emails from Michelle re filing motion and reply	0.50
	LCS	File motion to extend deadline (ECF)	0.20
	NB	Receive and review proposed order re deadlines from Michelle and Lucy and reply	0.30
02/05/2016	PAR	Receive and review multiple emails between attorneys re recent filing;	
		Receive and review ECF notice re joint motion for extension of time	0.20
	PAR	Receive and review ECF notice re opt out client	0.10
02/08/2016	PAR	Receive and review ECF notices re defendant's amended ID of expert and Order	0.20
02/11/2016	NB	Receive and review email from Jim re damages and reply	0.20
02/15/2016	NB	Receive and review correspondence from opposing counsel re confidential designation and attachment	0.20
02/16/2016	PAR	Receive and review ECF notice re defendant's motion to extend opt-outs deadline	0.10
	PAR	Receive and review two ECF notices re opt out clients	0.10
02/17/2016	NB	Receive and review correspondence from Jim re privilege issues and reply	0.20
02/18/2016	NB	Receive and review correspondence from opposing counsel re confidential designations of Woodside	0.10
02/19/2016	PAR	Receive and review multiple emails re motion for protective order; Electronically file same; Receive and review ECF notice re same; Prepare email to Judge re proposed order	0.20
02/20/2016	NB	Send filed motion to Judge Gergel; Receive and review emails re mediation; Letters from opposing counsel re designation of certain matters as confidential	0.40
02/24/2016	NB	Receive and review joint motion to extend deadlines	0.10
02/25/2016	NB	Receive and review correspondence from opposing counsel re order	0.10

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			Hours
02/29/2016	NB	Receive and review email from Jim and reply re extension	0.10
03/01/2016	NB	Receive and review text order	0.10
03/02/2016	PAR	Receive and review ECF notices re text orders	0.10
	NB	Receive and review emails re mediation	0.20
03/10/2016	NB	Telephone conference with Jim re settlement; Receive and review mediation letter	0.30
03/11/2016	NB	Receive and review emails re mediation and attend same	3.90
03/17/2016	NB	Receive and review emails from Jim re call to chambers	0.20
03/18/2016	PAR	Receive and review email from co-counsel re motion to stay deadlines; Electronically file same; Receive and review ECF notice re same	0.20
03/21/2016	PAR	Receive and review ECF notice re text order re motion to stay	0.10
03/28/2016	NB	Receive and review draft settlement agreement and reply to Jim	0.30
04/01/2016	NB	Receive and review email from opposing counsel re settlement agreement	0.10
04/11/2016	NB	Receive and review revised draft settlement agreement and email from Jim	0.20
04/14/2016	NB	Receive and review emails from opposing counsel re changes to draft settlement agreement	0.20
04/15/2016	NB	Receive and review joint draft motion and memo from Jim	0.30
04/17/2016	NB	Receive and review emails and proposed settlement documents	0.40
04/18/2016	NB	Receive and review emails re draft motion and memo from Jim and file same	0.20
04/19/2016	PAR	Receive and review email from Jim re joint status filing; Electronically file same; Receive and review ECF notice re same	0.20

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		Hours
	NB Review and analysis Jim's changes to draft settlement agreement	0.20
04/27/2016	NB Receive and review multiple emails from Jim and opposing counsel and reply re settlement documents; Receive and review revised exhibits	0.30
	FOR PROFESSIONAL SERVICES RENDERED	62.90

Bloodgood & Sanders, LLC**INVOICE**

242 Mathis Ferry Road, Suite 201
Mt. Pleasant, SC 29464

Invoice # Nov2016
Date: 11/28/2016

Southern Poverty Law Center
1989 College Avenue NE
Atlanta, GA 30317

2016-00041**Kiawah Island - Employment**

Type	Date	Notes	Quantity
Service	05/11/2016	Read and review emails from Jim and documents to be filed and sent to Chambers; Conference with Amanda regarding the same	0.40
Service	06/06/2016	receive and review emails and proposed order re sealing the record from opposing counsel and Jim	0.30
Service	06/07/2016	receive and review emails with documents to file with court re motion to seal; take steps to have same filed	0.20
Service	06/07/2016	PAR -Review and file Motion and send proposed order and Ex. C (for in camera review) to Judge	0.40
Service	06/08/2016	receive and review notice of hearing; emails with Jim re same	0.20
Service	06/10/2016	multiple emails re hearing before gergel; review terms before conference call re same; conference call with Jim and opposing counsel	0.80
Service	06/14/2016	attend hearing for preliminary hearing before Judge Gergel	1.20
Service	06/15/2016	PAR - (4x) Receive ECF notices re minute entry, notice of hearing, Order on Motion for Settlement, and Order on Motion to Seal	0.30
Service	07/13/2016	receive and review emails from opposing counsel and co-counsel re letters to plaintiffs and to attorney general re settlement	0.40
Service	07/18/2016	PAR - Receive and reply to email from Jim Knoepp re ECF filing; Electronically file notice to court re mailing completion; Receive and review ECF notice re same	0.20

Please make all amounts payable to: Bloodgood & Sanders, LLC

Please pay within 30 days.